

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c)  Norris McLaughlin, P.A. Melissa A. Pena, Esq. 400 Crossing Blvd., 8 <sup>th</sup> Floor Bridgewater, NJ 08807 917-369-8847 <a href="mailto:mapena@norris-law.com">mapena@norris-law.com</a> Attorneys for Rushmore Crossing LLC; CSHV Woodlands, LP; Overton Park Plaza Associates, LLC; and San Antonio Central Park Associates, LLC	
In re:  BED BATH & BEYOND INC., et al.,  Debtors. <sup>1</sup>	Chapter 11  Case No. 23-13359 (VFP)  Judge: Vincent F. Papalia  (Jointly Administered)

**APPLICATION FOR ADMISSION PRO HAC VICE**

Melissa A. Pena, Esq. (“Movant”), a member in good standing of the Bar of the State of New Jersey and an attorney admitted to practice before the United States District Court for the District of New Jersey, and a member with Norris McLaughlin, P.A., hereby moves the Court for an Order permitting Tara LeDay, Esq. to practice *pro hac vice* before the United States Bankruptcy Court for the District of New Jersey to represent creditors, Rushmore Crossing LLC (“Rushmore”), CSHV Woodlands, LP (“CSHV”), Overton Park Plaza Associates, LLC (“Overton”), San Antonio Central Park Associates, LLC (“SACPA”) pursuant to Local Bankruptcy Rule 9010-1. In support of the relief requested herein, Movant states as follows:

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<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number is 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of the Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

## **JURISDICTION**

This Court has jurisdiction to consider this application pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this application is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

## **RELIEF REQUESTED**

By this application, the Movant requests entry of an Order admitting *pro hac vice*, Tara LeDay (the “Applicant”). The good standing of the Applicant is set forth in the Applicant’s certification which is submitted herewith (the “Certification”).

Applicant is employed at Chamberlain Hrdlicka with an office at 1200 Smith Street, Suite 1400, Houston, Texas 77002. As the Certification demonstrates, Applicant is a member in good standing of the Bar of the highest court in which she is admitted.

It is anticipated that Applicant will be active in the representation in this action on behalf of Rushmore, Overton, CSHV, and SACPA. Accordingly, Movant respectfully requests that the Court grant the *pro hac vice* admission of Tara LeDay and that she be permitted to appear on Rushmore, Overton, CSHV, and SACPA’s behalf in connection with this case.

No previous application for the relief sought herein has been made to this or any other court in connection with this proceeding.

## **WAIVER OF MEMORANDUM OF LAW**

Pursuant to Local Rule 9013-1, Movant respectfully requests that the Court waive the requirement that it file a memorandum of law in support of this Application. Movant respectfully

submits that no memorandum of law is necessary because no novel issues of law are presented herein.

Dated: July 13, 2023

Respectfully submitted,

/s/ Melissa A. Pena

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